

Caterbots Privacy Policy

Effective date: October 16, 2025

Welcome to Caterbots ("Caterbots", "we", "us", or "our"). We provide AI-powered order-taking and call-handling services for restaurants and other food service businesses. This Privacy Policy explains how we collect, use, disclose, and protect personal information in connection with our websites (including <https://www.caterbots.com>), products, and services (collectively, the "Services").

This Policy is Canada-first and tailored to operations in Ontario, Canada. If you operate outside Canada, you may have additional rights or obligations under local laws. Where we process personal information on behalf of our business customers, we do so as their service provider/processor.

1) Who this Policy applies to

- **Clients:** Business customers who sign up for and administer the Services.
- **Client Authorized Users:** Individuals who access the Services on a Client's behalf (e.g. staff).
- **End Customers:** Individuals who interact with a Client via phone, messaging, or other channels powered by our AI (e.g. callers placing orders).
- **Website Visitors:** Individuals who visit our website or engage with our marketing.

2) Roles and responsibilities

Under Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and similar provincial laws, Caterbots typically acts as a service provider/processor when handling End Customer information on behalf of a Client. The Client is generally the organization/controller responsible for giving us instructions and for ensuring a lawful basis for processing. For certain activities (e.g. our own website analytics, billing, account management, and marketing), Caterbots acts as the organization/controller.

3) Personal information we collect

3.1 Information from Clients and Authorized Users

- **Account and profile:** name, business name, role, email, phone, login credentials, preferences.
- **Billing:** billing contact, address, tax IDs, plan details, payment method token (payment processing handled by third-party processors; we do not store full card numbers).
- **Service configuration:** locations, menus, hours, call flows, integrations, POS details, suppression lists, consent settings.

- **Usage and diagnostics:** logs, device/browser info, IP address, timestamps, feature usage, crash reports, cookie identifiers.

3.2 Information processed about End Customers (on behalf of Clients)

- **Telephony and messaging data:** caller ID/phone number, call audio, call recordings, voicemails, transcripts, SMS/MMS content, metadata (time, duration, routing), and menu selections.
- **Order context:** order items, instructions, delivery/pickup details, location info shared by the End Customer, order history.
- **Contact preferences and consent status** where provided by the Client or the End Customer (e.g. opt-ins/opt-outs).
- **Fraud prevention signals** where enabled by the Client.

3.3 Information from Website Visitors and marketing interactions

- **Forms and demos:** name, email, phone, company, message content.
- **Cookies and similar technologies:** see Section 11 (Cookies).

4) How we use personal information

- Provide and operate the Services, including AI order-taking, routing, integrations, quality assurance, and support.
- Authenticate users and secure accounts; prevent, detect, and investigate fraud, abuse, and security incidents.
- Configure and improve call flows and model performance, including supervised learning to enhance accuracy as instructed by the Client.
- Measure and improve Service performance; debug and develop new features.
- Process payments and manage subscriptions, invoicing, and collections.
- Communicate with Clients about the Services, including service announcements and administrative messages.
- Send marketing communications to prospects and Clients with appropriate consent under CASL (see Section 10).
- Comply with legal obligations and enforce our Terms of Service.

5) AI, training, and human review

- **Client control:** We process End Customer data according to the Client's documented instructions (e.g. in-product settings, DPA, or written agreement).
- **Model training:** We do not use End Customer content to train generalized models for other customers without the Client's permission. We may use aggregated or de-identified information to improve and secure the Services.

- **Quality assurance:** Limited human review may be performed by authorized personnel or subprocessors for QA, safety, and troubleshooting, under confidentiality obligations.

Upon Client request, Caterbots will disable non-essential human review; security and incident-response reviews may still occur where necessary to maintain the integrity and safety of the Services.

6) Legal bases and accountability (Canada)

We rely on reasonable purposes and appropriate consent under PIPEDA and applicable provincial laws, taking into account the sensitivity of the information and the context. Clients are responsible for obtaining and recording consent from End Customers for their use cases (e.g. call recording notice, marketing opt-ins).

7) Sensitive information

Our Services are not designed to capture full payment card numbers, government identification numbers, or similar highly sensitive personal information. We employ automated measures to detect and redact such data from call recordings and transcripts where possible. Clients should not solicit such information via calls or messages. Dietary and allergy preferences may be processed solely to fulfill orders at the direction of the Client.

8) Call recording and notice

Many jurisdictions require notifying callers that calls may be recorded or monitored. **Clients are responsible** for configuring call flows and prompts to provide legally required notices and for honoring opt-out mechanisms where applicable. Caterbots provides features to help Clients meet these obligations but cannot guarantee compliance for any specific implementation.

9) Sharing and disclosure

- **Service providers and subprocessors:** We use trusted providers (e.g. cloud hosting, telephony, analytics, customer support, payment processing). They may access personal information only to provide services to us and under contractual safeguards. We maintain a current list of subprocessors available upon request via legal@caterbots.com. Where we add a new subprocessor that may process Client Data, we will provide advance notice and an opportunity to object as described in our DPA.
- **Client-directed disclosures:** We share End Customer data with the Client and its systems (e.g. POS, delivery platforms) as configured by the Client.
- **Legal compliance and safety:** We may disclose information if required by law, regulation, subpoena, or court order, or to protect rights, safety, and the integrity of the Services.
- **Business transfers:** In the event of a merger, acquisition, financing, or sale of assets, information may be transferred as part of the transaction subject to applicable law.

10) CASL compliance (commercial electronic messages)

- We send commercial electronic messages (CEMs) only with express or implied consent or under an applicable exemption. Each CEM includes our identification and an easy unsubscribe mechanism.
- Clients using our Services to message End Customers are responsible for ensuring lawful consent, identification, and unsubscribe functionality for their CEMs. We provide tools (e.g. suppression lists) to help manage opt-outs.

11) Cookies and similar technologies

We use necessary cookies to operate our website and may use analytics cookies to understand site usage and improve performance. We display a cookie banner that allows you to accept all cookies, reject non-essential cookies, or manage preferences. We will not set non-essential cookies (such as analytics) unless you consent. You can change or withdraw consent at any time via the cookie banner or your browser settings. Where required by law, we will obtain consent for non-essential cookies before using them.

We do not set non-essential cookies or similar technologies unless and until you provide consent via our cookie banner. You can change or withdraw consent at any time via the 'Cookie Preferences' link in our site footer.

12) International data transfers

We may transfer, store, and process information outside of your province or outside Canada (e.g. in the United States). We implement contractual and organizational safeguards appropriate to the sensitivity of the information. By using the Services, you acknowledge these transfers. Clients should inform End Customers of cross-border processing where required.

For clients subject to EU/UK data protection laws, our Data Processing Addendum, including the EU Standard Contractual Clauses and UK Addendum, is available upon request and governs international transfers.

13) Security

- Encryption in transit and at rest for core data stores.
- Access controls, least-privilege, and role-based access for staff.
- Audit logging and vendor due diligence for subprocessors.
- Secure software development and vulnerability management practices.

No method of transmission or storage is perfectly secure; we cannot guarantee absolute security.

14) Retention and deletion

We retain personal information only as long as necessary for the purposes described or as required by law. Unless a different timeline is configured or required by a Client, our default retention periods are:

- **Call recordings and transcripts:** 180 days (configurable by Client).
- **SMS/MMS content:** 180 days.
- **Application/analytics logs:** 90 days.
- **Security/audit logs:** 12 months.
- **Billing/transaction records:** 7 years.

Where a Client configures 'transcripts-only' or 'no storage' modes, our retention practices reflect those settings.

Post-termination: We will provide a data export window of 30 days after termination. We will delete or de-identify Client Data within 30 days after the export window ends, subject to legal holds. Backup copies are purged within 90 days thereafter.

15) Your privacy rights

Subject to applicable law, individuals may request access to and correction of their personal information. Where we process information on behalf of a Client, we will refer requests to the relevant Client and assist them in responding. To make a request, contact us using the details below.

16) Breach notification (PIPEDA)

We assess security incidents and, where a breach of security safeguards creates a *real risk of significant harm* to individuals, we will report the breach to the Office of the Privacy Commissioner of Canada (OPC), notify affected individuals, and notify relevant organizations as required. We maintain records of all breaches for at least 24 months.

17) Children's privacy

Our Services are intended for businesses and are not directed to children. Clients should avoid collecting personal information from children without appropriate parental consent and should configure call flows accordingly.

18) Changes to this Policy

We may update this Policy from time to time. If we make material changes, we will provide notice (e.g. via email to account holders or in-product notice). The "Effective date" above indicates when this Policy was last updated.

19) Contact us

Questions or requests about this Policy can be sent to our Privacy Officer:

Email: privacy@caterbots.com

Postal: 440 Ashdale Avenue, Toronto, ON, M4L2Z2

Website: <https://www.caterbots.com>

20) Glossary

- **Client:** A business customer that contracts with Caterbots for the Services.
- **End Customer:** An individual who interacts with a Client through channels powered by Caterbots.
- **Service provider/processor:** An entity that processes personal information on behalf of and under the instructions of an organization/controller.
- **Personal Information:** Information about an identifiable individual, as defined by applicable law.

Appendix A — Subprocessor categories

We use the following categories of subprocessors to deliver the Services (examples only, subject to change):

- Cloud hosting and infrastructure (compute, storage, databases)
- Telephony and messaging carriers (voice/SMS/MMS routing)
- Analytics and monitoring (application performance, error tracking)
- Customer support tools (ticketing, helpdesk)
- Payment processors (subscription billing, card processing)
- Email delivery (transactional and service emails)

A current list of specific subprocessors is available at <https://www.caterbots.com/legal/subprocessors>. You may subscribe on that page to receive advance notice of material changes.

Note: This Privacy Policy is intended to align with Canadian privacy laws, including PIPEDA. Replace email addresses if you prefer different contact aliases.